

EXHIBIT D

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

GLS LEASCO, INC., and
CENTRAL TRANSPORT LLC,

Plaintiffs,

vs.

NAVISTAR, INC.,

Defendant.

Case No. 23-cv-12927-MAG-APP

Hon. Mark A. Goldsmith

Magistrate Judge Anthony P. Patti

**DEFENDANT NAVISTAR, INC.'S
RULE 30(B)(6) DEPOSITION NOTICE TO GLS LEASCO, INC.**

Defendant Navistar Inc. (“Defendant” or “Navistar”), by and through its undersigned counsel and pursuant to Fed. R. Civ. P. 30(b)(6), respectfully notifies the parties of its intent to depose a representative of Plaintiff GLS Leasco, Inc. (“GLS”) on September 10, 2024 at 9:00 am EST, at the offices of Kienbaum, Hardy, Viviano, Pelton & Forrest, 280 N. Old Woodward, Suite 400, Birmingham, MI 48009, on the following 30(b)(6) topics:

1. The factual allegations contained in GLS’s Amended Complaint including, without limitation, paragraphs 12, 13, 14, 15, 16, 18, 19, 20, 21, 22, 24, 25, 26, 27, 28, 29, 38, 39, 40, 41, 42, 43 and 44;
2. GLS’s litigation hold and efforts to preserve potentially relevant evidence in connection with the above captioned lawsuit (the “Lawsuit”);
3. The negotiations between GLS, Summit Truck Group and Navistar prior to the execution of the July 13, 2021 letter agreement.
4. GLS’s understand of each party’s obligation(s) under the July 13, 2021 letter agreement.

5. The negotiations between GLS, Allegiance Truck Group and Navistar concerning the April 8, 2022 letter agreement.

6. GLS's understand of each party's obligation(s) under the April 8, 2022 letter agreement.

7. The corporate structure and relationship between GLS, Central Transport, LLC, PAM Transport, Inc. and Universal Transport.

8. The factual basis for the claims asserted by GLS in Count One, Breach of Contract, of the Amended Complaint.

9. GLS's efforts to sell, and actual sales of each MY2018 Tractor sold by GLS as referenced in paragraph 42 of the Amended Complaint, including GLS's business dealings with the purchasers of the tractors in connection with same.

10. GLS's purchase of 630 Model Year 2018 tractors from Navistar on behalf of Central as referenced in paragraph 12 of the Amended Complaint.

11. The purchase and/or order of 1100 MY 2023 tractors from Allegiance Truck Group.

12. The factual basis for GLS's alleged loss revenue and profits for each of the MY 2018 tractors it sold as alleged in paragraph 42 of the Amended Complaint.

13. GLS's alleged damages in connection with its breach of contract claim.

14. The factual information provided in GLS's interrogatory responses served in this action.

The deposition will be recorded via stenography and videotape. The deposition will occur in person, at a mutually agreeable time and date, before a notary public or other officer authorized by law to administer oaths and will continue day to day until completed. Navistar requests that GLS provide written notice at least seven (7) calendar days prior to the Notice of the name(s) and title(s)

of the individual(s) designated pursuant to Fed. R. Civ. P. 30(b)(6) to testify on its behalf, and if more than one individual is designated, the topics upon which each individual has been designated.

Dated: July 22, 2024

BARNES & THORNBURG LLP

/s/ Scott R. Murphy

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CERTIFICATE OF SERVICE

I hereby certify that on July 22, 2024 a copy of the foregoing was served by e-mail to the following counsel of record:

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Dated: July 22, 2024

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